



## THE CITY OF FIRCREST

## PUBLIC WORKS

November 23, 2005

Mr. Jay Manning, Director  
Washington State Department of Ecology (DOE)  
P.O. Box 47600  
Olympia, WA 98504-76000

**RECEIVED**

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DEPARTMENT OF ECOLOGY  
OFFICE OF DIRECTOR

RE: Dept. of Ecology Draft NPDES Phase II Municipal Stormwater Permit

Dear Mr. Manning:

Thank you for providing the City of Fircrest an opportunity to provide comments on the draft NPDES Phase II Permit as proposed by the Department of Ecology. Public participation is an integral part of drafting a State permit that will provide appropriate provisions, guidelines and support of the common goals outlined in the Environmental Protection Agency's requirements.

The City of Fircrest has a long history of proactively supporting water quality and the goals of the NPDES system. In 1988, the City first enacted provisions for funding stormwater pollution prevention and have since continually provided services to directly reduce the impact of stormwater on water quality. We provide many of the services that the NPDES permit system attempts to achieve through local control and a proactive approach to the problem. We are able to customize our activities to provide the greatest impact at the lowest possible cost to our constituents.

The permit as currently drafted appears to sacrifice this local approach to stormwater in favor of general requirements that will add substantial cost to our operations with only marginal benefits. The draft permit appears to go far beyond what is required by the EPA, providing additional standards that are difficult to meet without sacrificing our current service levels. As such, we consider this draft permit to be an unfunded mandate.

If it is the intent of the Department to require cities such as Fircrest to comply with the provisions contained within the draft permit (some of which are beyond the Federal guidelines contained within the 12/8/99 federal Register), then we implore DOE to provide financial assistance to communities such as ours. Denying additional financial resources to comply with these provisions will have significant impacts to Fircrest and other jurisdictions. Your consideration in this regard is greatly appreciated.

Sincerely,

David Viafore  
Mayor